Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)	
)	CC Docket No. 95-116
)	NSD File No. L-98-16
Telephone Number Portability)	

REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION IN OPPOSITION TO PETITION FOR EXTENSION OF TIME OF SOUTHWESTERN BELL TELEPHONE COMPANY AND PACIFIC BELL

MCI Telecommunications Corporation (MCI), by counsel, hereby files these reply

comments in opposition to the Petition For Extension of Time of Southwestern Bell Telephone

Company and Pacific Bell (collectively referred to as SBC) (SBC Petition), filed on February 20,

1998.[1]

Five parties filed comments regarding SBC's Petition. They are Illuminet, Inc.

(Illuminet), AT&T Corp. (AT&T), Time Warner Communications Holdings, Inc. (Time

Warner), and WorldCom, Inc. (WorldCom). The parties' comments are discussed below, with a

particular emphasis on those parties agreeing with MCI that SBC's Petition should be denied.

Time Warner's comments point out that, in addressing SBC's Petition, the Commission

should "review closely the manner in which SBC has gone about implementing long term

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[1] *Public Notice*, Common Carrier Bureau Seeks Comment on SBC Companies Petition
For Waiver Under 47 C.F.R. § 52.3(d) And Petition For Extension of Time Of The Local
Number Portability Phase I Implementation Deadline, CC Docket No. 95-116, N.D. File No.
L-98-16 (rel. March 3, 1998).

number portability."[2] MCI agrees with Time Warner that the Commission should strongly

consider imposing a fine on SBC, pursuant to section 503(b)(2)(B) of the Telecommunications

Act.[3] The Commission should also be aware of several events that support Time Warner's

position. Specifically, there were several occurrences between December 1997 and February 20,

1998, when SBC filed its petition, that support the position advocated by Time Warner that SBC

should be fined for its behavior in deploying LNP.[4]

In addition to section 503, referenced specifically by Time Warner, the Commission

should also consider section 501 of the Act, which states that if any person:[5]

> willfully and knowingly omits or fails to do any act, matter, or
> thing in this Act required to be done, or willfully and knowingly
> causes or suffers such omission or failure, shall upon conviction
> thereof, be punished for such offense, for which no penalty

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[2]Comments of Time Warner, p. 1.

[3]*See id.*, pp. 3-4. Time Warner also makes two other significant points with which MCI agrees. First, if the Commission grants SBC's Petition, it should require SBC to maintain interim LNP until the date long-term LNP is implemented. *See* Comments of Time Warner, p. 6. To add to this point, MCI strongly urges the Commission to specifically order that, during the period of time during which SBC's LNP obligation is extended, SBC cannot charge carriers more for interim LNP than it is currently charging, and should not charge carriers for converting from interim LNP to long-germ LNP those customers that were forced to port their numbers using interim LNP methods during any period of extension. (*See also* Comments of AT&T, pp. 15-16.) Second, MCI disagrees that other carriers must be given a waiver of the LNP obligation to the extent SBC obtains one, until the date upon which SBC implements LNP it its network. There is no reason to alter LNP deployment requirements for all carriers simply because SBC is unable to meet it statutory obligations. The better solution is to order SBC to deploy LNP, particularly in light of the fact that SBC currently has the fix to its STP problem, and can deploy LNP if it applies itself diligently and uses its best efforts to do so.

[4]*See* Affidavit of Dick Dowd (Dowd Aff.), ¶ 9, attached as Exhibit 1 ("live testing referenced by [SBC] must have started on or about December 19, 1997, and not on January 21, 1998, as stated in the [SBC] Petition For Waiver.)

[5]"Person" is defined in the Telecommunications Act to include an individual, partnership, association, joint-stock company, trust, or corporation. *See* 47 U.S.C. § 3(32).

(other than forfeiture) is provided in this Act, by a fine of not more
than $10,000 or by imprisonment for a term not exceeding one year,
or both.[6]

The Act also provides for a fine of not more than $500 for each and every day during which an

offense occurs.[7] Time Warner is correct in its assertion that SBC's behavior regarding its

deployment of LNP is worthy of serious consideration for imposition of fines pursuant to the

sections of the Act.

In further support of Time Warner's position, and MCI's support thereof, MCI has

attached to these comments the affidavit of Dick Dowd, an expert in the field of LNP

deployment, and the person selected by all LNP participants, including SBC, to coordinate the

Houston Inter-Company Network LNP testing effort.[8] Mr. Dowd has reviewed the affidavits

submitted in support of SBC's Petition, as well as the comments submitted by Time Warner and

the other commenting parties in this proceeding, and is familiar with the facts that support the

imposition of penalties against SBC, as suggested by Time Warner.[9]

For example, the inter-company network testing group met on a twice daily basis via

conference call to "discuss any and all problems encountered during testing.[10] During these

meetings, beginning in early February, SBC's representative in the group continuously assured

the group that he was unaware of any testing problems being encountered by SBC that were

considered "show stoppers, and/or that may result in a need for SBC to request an extension of

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[6]47 U.S.C. § 501.

[7]47 U.S.C. § 502.

[8]*See* Dowd Aff., ¶ 4.

[9]Dowd Aff., ¶ 6.

[10]Dowd Aff., ¶ 11.

the Commission's LNP deployment schedule.[11] Now that SBC's Petition has been filed, it is clear that SBC was aware of such problems, and that SBC's representative on the inter-company network testing group, withheld that information, and then, failed to make his best efforts to fully inform Mr. Dowd and the inter-company network testing group of the severity of the problems.[12] The omission of information about SBC's problems was particularly egregious since part of the reason for the inter-company network conference calls was to meet so that "the entire SPOC team [could] work through the problems until they [were] resolved."[13] This behavior clearly supports imposition of penalties, as suggested by Time Warner.

AT&T also comments that a potential resolution to SBC's problem lies in continuing to handle LIDB queries in the same manner as they are being handled currently for in an interim LNP environment, thus permitting SBC to offer long-term LNP notwithstanding its switch problems.[14] MCI disagrees with this suggestion because it would require MCI and some other carriers to, at a later, date, remove the numbers out of SBC's LIDB database and placed into the LIDB database owned by the carrier to which the customer has ported. MCI sees no need for an alternative. Again, MCI urges the Commission to require that SBC test the fix that it already has, and deploy it according to the Commission's current LNP deployment schedule.[15] Adoption

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[11]*See* Dowd Aff., ¶¶ 13, 15.

[12]*See* Dowd Aff., ¶¶ 18-25. The information eventually provided to Mr. Dowd by SBC's inter-company network testing representative conflicts in many respects with the information provided by SBC in its petition. *See, e.g.,* Dowd Aff., ¶ 26.

[13]Dowd Aff., ¶ 14.

[14]AT&T Comments, p. 9.

[15]If the Commission adopts AT&T's proposed solution, it should also order that SBC reimburse carriers for the additional administrative burden associated with implementation of that solution.

of AT&T's proposal, on the other hand, would be a severe administrative burden for MCI, which has developed order coordination processes to handle internal business process rules for LNP MCI's order coordination processes involve a series of porting requirements which would have to be changed significantly in order to accommodate AT&T's proposal. In addition, SBC would have to work with other carriers to develop and implement a process whereby LIDB numbers could be moved from one database to other. This undertaking would require a substantial amount of resources and time, both of which should be directed at this late date toward SBC's use of the fix it already has to deploy LNP in a timely fashion.

AT&T also comments that the Commission should alter a Texas Public Utilities Commission (PUC) Order based on Project No. 16091 For Code Opening, regarding how MSAs should be opened to portability. AT&T does this when its suggest in its comments that SBC should only perform queries for calls to NXXs from which a number has actually been ported.[16] While MCI agrees that no charges should be imposed unless and until a customer ports, MCI disagrees with AT&T's suggestion that the timing for beginning LNP queries should be delayed, because this solution adds delay to the porting process from a network perspective. Per the industry agreement and the PUC order, NXXs should be opened as soon as the switches to which they are assigned are LNP-capable, and not after at least one number in an NXX has ported.

The comments of Illuminet are irrelevant and self-serving. Illuminet is a provider of LNP services and administrative functions to the telecommunications industry.[17] Illuminet's comments simply point out that SBC has available to it outside vendors that may be able to assist

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[16]AT&T Comments, p. 11.

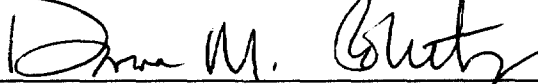[17]*See* Comments of Illminet, p. 1.

it in meeting its statutory LNP obligations.[18] It further urges the Commission to grant SBC an extension of time so SBC can "make interim third party arrangements . . ., which Illuminet anticipates will take significantly less time than that requested in the [SBC] Petition."[19]

Illuminet's comments should be disregarded because, other than the blanket statement that SBC has not met its burden to obtain an extension of the LNP, they add nothing to the specific issues that must be considered by the Commission when ruling on SBC's Petition. Illuminet's comments are, instead, clearly designed to inject itself into the internal LNP deployment decisions at SBC. Simply stated, Illuminet is making a business pitch to SBC in the hopes that SBC will engage its services to aid in deploying LNP within its network. This business proposal adds nothing to the substance of the record in this proceeding, and, as such, should be disregarded.

WHEREFORE, for the foregoing reasons, the Commission should deny SBC's petition for waiver under 47 C.F.R. § 52.3(d), and its petition for an extension of the Phase I, II and III LNP deployment deadlines.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

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Dated: March 16, 1998

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[18]*Id.*, p. 2.

[19]*Id.*, p.3.

EXHIBIT 1

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C.

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In the Matter of   )

)   CC Docket No. 95-116

Telephone Number Portability)

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AFFIDAVIT OF DICK DOWD

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1. My name is Dick Dowd. I am employed by MCI Telecommunications Corporation (MCI) as an

    External Liaison for Local Number Portability (LNP) in the Local Numbering group. I have been

    employed in various capacities in the telecommunications industry for over 30 years. I have been

    employed by MCI since 1983. In this capacity I represent MCI around the country, both inside and

    outside of the company, with respect to LNP issues, including Inter-Company Network testing.

2. Some of the positions that I have held while employed by MCI are:

    - Local Number Portability Advisory Engineer
    - Network Systems Architect for Local Number Portability
    - Illinois LNP FCC Field Test Coordinator
    - Detroit LNP Field Test Coordinator
    - New York, New York LNP Trial Coordinator
    - Lead Program Manager Switched Systems Engineering & Planning
    - Installation Program Manager Data Systems Program Management
    - Implementation Team Leader Virtual Private Data Service Products
    - Program Manager Transmission and Data Systems Infrastructure
    - Program Manager Network Management and Surveillance Systems
    - Supervisor for Circuit Design and Channel Engineering Private Lines
    - Multiplex Message Implementation Supervisor West & Pacific Regions
    - Multiplex Junction Installation Field Engineer & Circuit specialist

3. As a member of MCI's LNP External Liaison group, I interface with my counterparts in similar groups

    within other local exchange carriers (LECs) on all matters relating to LNP, number pooling, Inter-

    Company Network LNP testing, and number conservation measures. I also coordinated Inter-

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Company Network testing for the Federal Communications Commission's (Commission's) mandated

Illinois LNP FCC Field Test (LNP Field Test) in Chicago, Illinois. My role in the LNP Field Test was

to manage the combined efforts of MCI, Ameritech, Sprint, AT&T and TCG to successfully

implement LNP in Chicago. I provided oversight for the development of the Illinois LNP FCC Field

Test Final Report which was filed with the Commission by the Illinois Commerce Commission Staff in

October 1997. While performing this role, I was an independent and neutral third party, acting on

behalf of all of the carriers that participated in the LNP Field Test. I did not represent MCI. Since

October 1997, I have performed the same neutral role in Detroit, Michigan, New York, New York and

Houston. Companies that I have represented in the various testing project include: AT&T, Ameritech,

American Telco, Bell Atlantic-North, GTE, Lufkin-Conroe, MCI, Sprint, Southwestern Bell Telephone

Company, Bell Telephone, Teleport Communications Group, Time Warner Communications, WinStar,

and WorldCom. An article, quoting me extensively as an expert on all matters relating to LNP and

LNP testing, was published about the Illinois LNP FCC Field Test in the December issue of Tele.Com,

an industry magazine. On a regular basis, I accept invitations to speak at Lockheed Martin Cross

Regional Meetings, where we discuss any and all issues relating to number portability, pre-requisite

testing and Inter-Company Network Testing.   In addition, I represent MCI to the Ameritech Region on

the following committees: Operations Committee, Implementation Committee, Test Committee,

Steering Committee and an first alternate for the Limited Liability Company for the Midwest Region.

4. Due to my previous work involving Inter-Company Network Testing for LNP, I was selected by the
    Implementation and Operations Committee in the Southwest Region to coordinate their Houston Inter-
    Company Network LNP Testing effort.

5. Prior to performing the Inter-Company Network Test Coordination function, I was the MCI LNP
    Network Systems Architect. In that role, I designed physical systems and components that allowed
    MCI to provide LNP services. I was also a member of the NPAC/SMS Committee that defined the
    requirements to design the Number Portability Administration Center (NPAC). This committee also
    defined the Illinois Interface Specification for the interface between the NPAC and each service
    providers' Local Service Management System (LSMS) and Service Order Administration (SOA)
    system. The basis for the Illinois LNP FCC Field Test was the New York LNP Test Plan that was

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developed under my guidance for the NY LNP Trial of the Carrier Portability Code method of performing LNP. The test plan that was developed under my guidance for New York was the basis for the Illinois Test Plan and has now been selected by every region as the basis for the testing of LNP. The Network Interconnection/Interoperability Forum (NIIF) reviewed the document and selected and published certain tests from the test plan as the NIIF minimum set of tests to test the interconnection between companies for LNP. I am the author of an LNP Field Test Execution Handbook for each of the cities where I performed the role of Test Coordinator. The LNP Field Test Execution Handbook outlines the particular method of performing LNP Inter-Company Network Testing that I developed and utilized successfully in Chicago, Detroit, New York and Houston. The handbook is available for down load on the World Wide Web. Using my method of performing Inter-Company network testing for LNP, each participating company selects a Single Point Of Contact (SPOC) to represent their companies' technical interests during testing. Mike Rydman is the SPOC for Southwestern Bell Telephone Company (SBTC). In my capacity as the Inter-Company Network Testing Coordinator for the Houston LNP test effort, I was scheduled to communicate via conference call with Mr. Rydman on a daily basis.

6.   I have read the Petition For Waiver Under 47 C.F.R. § 52.3(d) And Petition For Extension of Time Of The Local Number Portability Phase I Implementation Deadline filed by SBTC. I have also read the comments submitted by AT&T, Time Warner Communications, Illuminet, MCI and worldCom. Based on my qualifications and experiences in the telecommunications industry, as it relates to local number portability, my review of these proceedings, I am qualified to comment on the technical substance of SBTC's filing.

7.   According to SBTC's Petition, at least some of SBTC's reported problems were discovered outside the confines of the Houston LNP Inter-Company Network Testing. SBTC indicates on page 2 of the Petition that information necessitating its waiver request was not discoverable until very recently, and was not known prior to the expiration of the 60 day waiver request period. Yet in a subsequent paragraph on the same page, SBTC states, "In this case, the STP feature at issue was not at the testing stage that involved live testing until January 21, 1998." The STP is the Service Transfer Point. Since

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the time to file a waiver petition did not pass until January 29, 1998. SBTC knew a full eight days before the waiver request deadline that a petition for waiver may have been necessary.

8. SBTC never explains in its Petition what is meant by "live testing, or what "live testing" was initiated by SBTC on January 21, 1998. The Houston LNP Inter-Company Network Testing was initiated on February 2, 1998, and telephone numbers were not ported until February 6, 1998. It is thus unclear what testing SBTC initiated on January 21.

9. On page 2 of the Petition for Waiver, SBTC states, "two of the critical problems were identified after having been in service for over eight weeks." This reference is puzzling to say the least, since only 2 ½ weeks passed between February 2, 1998, and February 20, when SBTC filed its Petition. Giving SBTC the benefit of the doubt and assuming that it took SBTC only one day to prepare its Petition, counting back eight weeks from February 19, 1998, would mean that the "live testing" referenced by SBTC must have started on or about December 19, 1997, and not on January 21, 1998, as stated in the SWBT Petition for Waiver.

10. As indicated above, the Houston LNP Inter-Company Network Testing started on February 2, 1998, with the issuance of Local Service Request (LSR) forms between the companies that participated in the porting tests. By February 6, 1998, most of the ported telephone numbers were active on the new service providers' switch. This event successfully completed week 1 of the Houston Testing.

11. Call through testing was initiated during Week Two of the Houston LNP Inter-Company Network testing. Call through testing involves the placement of several phone calls to and from ported numbers in order to ensure that none of the services provisioned on the ported telephone numbers were impacted in anyway by the act of being ported. Beginning on February 9, 1998, the SPOC for each carrier participating in the LNP Inter-Company Network testing, was requested to participate in twice daily conference calls. The first call of the day began at 8:30AM, CST, and the second call of the day was held at 4:00 PM, CST. Thus, every business day from February 2 to February 27, each carrier's SPOC representative was scheduled to meet and discuss any and all problems encountered during testing. I, along with SBTC's SPOC, Mike Rydman and all other SPOC's were scheduled to take part in each call. It was not until February 11 that Mike Rydman mentioned for the first time that SBTC had experienced a major Line Identification Database (LIDB) problem, which it had referred to DSC

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Communications, SBTC's vendor, for trouble shooting and resolution. SBTC then continued its call through testing.

12. During the conference call on the afternoon of February 11, 1998, Mr. Rydman advised that SBTC had problems with DSC's STPs when used to perform LIDB Database functions, and that due to these problems, SBTC was unable to activate the LIDB Database for live traffic. SBTC had tested the STPs/LIDB combination, only during "off hours," defined as hours during the middle of the night when traffic volume is very low for LIDB Database look-ups. Mr. Rydman further advised that once SBTC started Inter-Company Network testing during the day time it was discovered that the DSC software caused problems with SBTC's AIN services, and also caused credit card Personal Identification Number (PIN) errors. As a result of the problems, SBTC deactivated the STP/LIDB combination, and referred the problem to DSC. SBTC then continued with call through testing, while DSC looked into the possibility of providing a patch to the software to resolve the problem.

13. During the call, Mr. Rydman indicated that the problem identified on the call was not a show-stopper, and he stated "SBTC will continue with call through testing as scheduled," or words to that effect. On the call, I was not led to believe the issue identified by Mr. Rydman was anything to be concerned about or would require a delay of LNP deployment.

14. Throughout the history of LNP testing, SPOCs have raised technical and operational issues on a daily basis, and the entire SPOC Team has worked through the problems until they are resolved. The problem report by SBTC of this particular issue appeared no different than any of the other countless issues raised by the SPOC Team.

15. During this February 11 SPOC conference call, a roll call of all participating companies was taken, and each SPOC was asked, "Do you see any reason that your company will not be able to successfully complete your Inter-Company network testing by close of business February 27, 1998 as scheduled"? Each company, including SBTC, responded that they knew of nothing that would interfere with successful completion of the testing on February 27

16. I was unable to attend the SPOC conference call on February 12, 1998. Debbie Cathey of AT&T facilitated the conference call in my absence. I asked Ms. Cathey to do this, as she had facilitated similar conference call s in the past as part of the SPOC Team in Chicago, New York, New York and

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Houston. Following the conference call, Ms. Cathey reported to me SBTC was still experiencing

LIDB problems and could not test internal LIDB, but wanted to try LIDB queries. Ms. Cathey told me

that Mr. Rydman had requested on the call that MCI and AT&T try to complete some third party

billing calls. Ms. Cathey also told me that Mr. Rydman was working a Telephone Operator Position

Service (TOPS) issue with American Telco, and was continuing to do CLASS™ and 911 testing. The

reports of these minor incidents were not significant enough to lead me to believe that SBTC was

encountering challenges that might lead to a request to delay deployment of LNP.

17. I chaired the morning conference call on February 13, 1998, and since Mr. Rydman was not on the

call, another person from SBTC represented him on the call. I cannot recall his name, but I think his

first name may have been Richard. On the call, the SBTC representative sitting in for Mr. Rydman

reported that general testing was proceeding apace as of that day, and that E911 problems and calling

name delivery issues were being worked internally at SBTC. Based on this information, and since

Mr. Rydman was not on the conference call and had reported just the date before that there were no

outstanding issues that could result in a delay of LNP deployment, the SPOC Team cancelled the

Friday afternoon call. Since February 16 was a federal holiday, it was decided that the SPOC call for

that day should be cancelled as well. The next SPOC call was thus scheduled for February 17.

18. On February 13, I learned from my manager, Jim Joerger, that on February 12, several MCI

representatives, including Mr. Joerger, Suzanne Brooks and Don Price, met informally with the staff of

the Texas Public Utilities Commission (Texas Commission) to discuss general number conservation

issues. Mr. Joerger told me that during that meeting, a Texas commission staff member mentioned that

SBTC had spoken to the Texas Commission on at least one previous occasion regarding SBTC's

possible need for a waiver of the March 31 LNP deployment deadline. Since nothing of this

magnitude had been reported to the SPOC team during the twice daily conference calls, I received this

news with shock and disbelief.

19. I immediately placed calls to Mr. Rydman at his office and received phone mail. I left him an urgent

message that I needed to speak with him immediately. I left my office and home telephone numbers.

Additionally, I paged Mr. Rydman, but discovered that I could not reach him because his paging

system was not functioning properly. When working properly, Mr. Rydman's voice comes onto the

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phone and leaves you a message. In this case I was prompted for a PIN number. As this is not how Mr. Rydman's paging service works, he has no PIN number, I was unable to place a page to him. I did not place further calls to Mr. Rydman's office.

20. At approximately 6:00 PM CST, on February 13, Mr. Rydman returned my call. On the call, I asked Mr. Rydman if SBTC had any serious problems that might delay LNP deployment. Mr. Rydman responded that SBTC had just discovered on the afternoon of February 12, 1998 that, on that same date, DSC reported that it would be unable to provide a simple patch to clear SBTC's LIDB problem. Instead, a new point release of DSC software would be required in order to fix the problem. I asked Mr. Rydman why this information was not brought to the attention of the SPOC Team. Mr. Rydman replied that, once SBTC discovered the severity of the problem, he had been too busy with internal meetings to attend the SPOC Team calls to report on the matter. I asked Mr. Rydman to provide me with a detailed explanation of the problem for the weekly report, as the SPOC Team publishes a Weekly Testing Report each week. This report is a weekly summary of all events reported by the participating companies. Mr. Rydman agreed to do so.

21. No meetings were held On Monday February 16, as this was a federal holiday.   On the February 17, morning conference call, I asked Mr. Rydman to bring the SPOC Team up to date on the SBTC DSC software problem that we discussed the previous Friday afternoon. Mr. Rydman reported that there were problems associated with SBTC's use of DSC STPs as the LIDB database. Mr. Rydman reported that the STPs had been tested by SBTC during off hours, again, those hours in the middle of the night when very little traffic volume is expected. Mr. Rydman indicated that once SBTC began Inter-Company Network testing, the DSC software caused problems SBTC's AIN services and also caused credit card PIN errors. Due to these problems SBTC turned off their combined STP/LIDB database and proceeded with Inter-Company testing, while DSC continued looking into a patch. It was thought early on that a patch would resolve the problem.

22. Mr. Rydman further reported that DSC told him they would have a new point release of their software ready to be tested by SBTC by the end of March 1998. Mr. Rydman then indicated that SBTC would then need to perform regression tests on the new software. SBTC would determine later in the week how long the testing would take, but that they probably would not be able to complete the testing in

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time to deploy LNP in Houston on March 31. Mr. Rydman reported SBTC's plan to submit a waiver

to FCC by February 20, and would continue to test everything except for Operator Services. Mr.

Rydman asked that some companies leave up some ported numbers, that is leave numbers that have

been ported in and out of SBTC active and residing on the new service providers switch so that SBTC

could test them once the new software was received. Mr. Rydman reported and continues to report

that SBTC will not receive the software release from DSC until the end of March. The date of the

receipt of the release to clear the problems has a definite bearing on SBTC's timeline. During this call,

I reminded the SPOC Team that they owed me a weekly summary report of testing progress and that

this was due by noon today. This weekly report was agreed to by the SPOC Team prior to the start of

Inter-Company Network Testing in Houston.

23. On the February 17, 1998 afternoon conference call, I asked Mr. Rydman if he planned to send me a

weekly summary of testing status along with a detailed update regarding SBTC's problem. I expected

to receive it by noon, as had been agreed to on the morning conference call. Mr. Rydman indicated

that he had not had time to send one yet. I reminded Mr. Rydman that this was the second week that

SBTC had failed to submit a report, and that the entire SPOC Team was waiting to read about SBTC's

problem so that they could begin to address it, as the SPOC Team had done through out Inter-

Company Testing. I then wrote a description of the SBTC problem as I understood it and forwarded it

via electronic mail to Mr. Rydman. My message to Mr. Rydman is attached to this Affidavit as

Exhibit A. Mr. Rydman sent me an electronic message verifying the accuracy of my summary. Mr.

Rydman's verification to me is attached to this Affidavit as Exhibit B. Mr. Rydman also forwarded me

the requested weekly testing summary. This summary is attached to this Affidavit as Exhibit C.

24. On February 20, 1998, Mr. Rydman reported that SBTC was extremely close to completing its call

through testing. Mr. Rydman also indicated that SBTC would, later that day, ask the Federal

Communications Commission for a waiver of the March 31, 1998 LNP ready date.

25. On February 26, 1998, after reading the SBTC Petition for Waiver I asked Mr. Rydman a series of

questions regarding the Petition for Waiver. This was done on the SPOC Team conference call where

all participating companies could hear. The following is a summary of what was said. I asked Mr.

Rydman what exactly is impacted by the DSC problem and he responded that calls from the SBTC

network to numbers that were ported out of the SBTC network were impacted. Calls from SBTC

credit cards from the SBTC network to numbers ported out of the SBTC network were impacted. And

calls from SBTC Payphones to numbers ported out of the SBTC network were also impacted. I then

asked if this is all that he knew of as being impacted and he responded that these are the only problems

that he knew of. I then asked Mr. Rydman if SBTC had received a fix, new software point release,

from DSC to resolve the SBTC problem, and he responded that SBTC has not received a fix as of that

time. I indicated that it was my understanding that DSC provided a point release of their software to

SBTC on February 17, 1998 and asked Mr. Rydman to confirm if this was true. Mr. Rydman

responded that SBTC had not received a point release from DSC to resolve their problem but he

expected to receive one by the end of March. I then indicated that it was my understanding that there

were problems between GTE and SBTC relating to the LIDB database or Operator Services. I asked

Mr. Rydman if he knew of these problems. Mr. Rydman indicated that he had not heard of these

problems and didn't feel that there were any problems between GTE and SBTC.

26. During the February 27, 1998 afternoon conference call I again asked Mike Rydman a series of

questions related to the Petition for Waiver submitted by SBTC to the FCC. The following is a

summary of that discussion that was heard by the SPOC Team present on the call. I asked Mr.

Rydman whether SBTC received release 10.10 from DSC to initiate testing in your TRI Lab on

February 17, 1998. Mr. Rydman indicated that this was not the case, and I reminded him that SBTC's

Petition For Waiver states that SBTC received the software on February 17, 1998. I wondered out

loud what he had to say about that, and he indicated that SBTC had not received a point release and

would not until the end of March. I then asked Mr. Rydman whether the SPOC Team was to believe

him or what was submitted by SBTC to the FCC? Mr. Rydman then indicated that it was very strange

because he didn't know of any receipt of a point release and he wondered where the information came

from in the FCC submission. I then told Mr. Rydman that, SBTC lists three critical problems in the

SBTC request for waiver.

    a.   The first critical problem is the interoperability of the Message Relay Service with queries

        originating in GTE's network. I asked Mr. Rydman whether this problem was found during

        Inter-Company network testing which was initiated on February 2, 1998, and Mr. Rydman

March 13, 1998

stated that this problem was not found during Inter-Company network testing and that SBTC knew about this problem before the start of the Inter-Company network testing, and that was why SBTC was using the combined STP/SCP in Houston. This is the solution to be used by SBTC in Houston and Los Angeles. The y will use a Bellcore solution in their other cities. SBTC had experienced problems with the Bellcore SPC prior to testing and moved quickly to the DSC platform so that Inter-Company network testing would not be delayed in Houston.

b.   I further told Mr. Rydman that, according to SBTC's filing, the second problem was the inability of the STP to process certain AIN based services properly. I then asked Mr. Rydman if this problem was found during Inter-Company network testing and he responded that this was true. I asked if Mr. Rydman if he could be more specific as to what AIN-based features exactly were affected, and how. Mr. Rydman asked me if I wanted to know the exact 111's and 000's that caused the problem. I assured him that that is not what I was asking, but I wanted to know what precise features were caused by the problem to become inoperable. Mr. Rydman seemed to become angry at this point and indicated that he wasn't going to tell me what AIN features were impacted by the problem. He further stated that the AIN features were SBTC features, and all that the SPOC Team needed to know was that there was a problem. I attempted to explain that the reason I asked for specifics is so that they could be added to the Final Test Report for Houston. The reason for adding these specifics to the Final Report is so that other companies can benefit from the knowledge gained during the Houston testing. Mr. Rydman responded that he would submit a statement for the report but would not go into specific's regarding the SBTC AIN features.

c.   I reported to Mr. Rydman that, according to SBTC's filing, the third problem was reported as the failure of a DSC software release to properly perform certain LNP network management functions used to prevent network overload. I asked Mr. Rydman if this problem was found during Inter-Company network testing and he responded that it was not, it had nothing to do with our Inter-Company network testing."

Further Affiant Sayeth Naught.

Dick Dowd (signature)

Dick Dowd

3/13/98

As to Signature:

Linda J. Taylor

3/13/98

LINDA J. TAYLOR
NOTARY PUBLIC
State of Texas
Comm. Exp. 02-28-2000
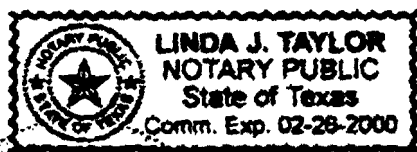
March 13, 1998

Exhibit "A"

March 13, 1998

Ex#IBIT "A"

Date: Tue, 17 Feb 1998 15:39 -0600 (CST)
From: Dick Dowd <dick.dowd@mci.com>
Organization: MCI
To: ""RYDMAN,
    MICHAEL A"" <mr7508@txmail.sbc.com>
Priority: High
Subject: Houston, Texas Inter-Company Network Testing Summary Week 2

Mike,

For the second week in a row I have not received a testing summary
from SWB. Therefore I wrote what I believe to be the problem in this
report. Please read and get back to me prior to 4:30 today if you
approve of my wording.

Dick

Forwarded message:

To: Ralph Albright <ralph.albright@alltel.com>
To: Rick Allen <ral315@txmail.sbc.com>
To: Ken Barnes <ken.barnes@alltel.com>
To: Patrick Brazil <pbrazil@lctx.com>
To: debbie cathey <dcathey@wlb.ho.att.com>
To: Clark Cooper <cc756@sbc.com>
To: Marty Detling <martin.l.detling@alltel.com>
To: Eugene Duffy <eduffy@choicecom.net>
To: Brenda Flood <brenda.flood@wcom.com>
To: Kathleen Hartley <khartley@winstar.com>
To: Tom Karins <tkarins@brooks.net>
To: karen.kay <karen.kay@twcable.com>
To: Dawn Lawrence <dlawrence1@brooks.net>
To: Harold McKenzie <h1mac@gte.net>
To: Hampton Oberle <554-8404@mcimail.com>
To: John Onofrey <john.onofrey@alltel.com>
To: Warren Potts <warren.potts.ntwkgd@igate.sprint.com>
To: ""RYDMAN
To: MICHAEL A"" <mr7508@txmail.sbc.com>
To: Toni Sanders <ts9475@txmail.sbc.com>
To: Kedar Sant <ksant@att.com>
To: Shelly Shaw <shelly.shaw@wcom.com>
To: John Skidmore <jskidmore@amtelco.com>
cc: Carolyn Bizilia <Carolyn.Bizilia@mci.com>
cc: Suzanne Brooks <Suzanne.Brooks@mci.com>
cc: Cindy Brown <215-7674@mcimail.com>
cc: "CASTEEL, DONALD C" <DC4585@txmail.sbc.com>
cc: Don Dabney <dd2849@txmail.sbc.com>
cc: David Heath <444-2882@mcimail.com>
cc: Jim Joerger <Jim.Joerger@MCI.Com>

cc: Mark Lancaster <lancaster@bsi.att.com>
cc: Maggie Lee <mlee@illuminetss7.com>
cc: madole <madole@att.com>
cc: Steve Markowski <smarkowski@npac.com>
cc: 'Melissa May' <melissa.may@mci.com>
cc: Ron Rotondi <Ron.Rotondi@MCI.Com>
cc: william seidler <w.seidler@att.com>
cc: Shelly Shaw <NPC_dallas@hotmail.com>
cc: John F. Shea <jfshea@worldnet.att.net>
cc: Rebecca Stillings <rstillings@illuminetss7.com>
cc: Jan Trout-Avery <jan.trout-avery@npac.com>
cc: Anne A. Turner <385-1465@mcimail.com>
cc: 'Robin Walker-Cameron' <Robin.Walker@mci.com>
Subject: Houston, Texas Inter-Company Network Testing Summary Week 2
Week two of the Houston, Texas LNP Inter-company Network testing
involved call through testing, starting with basic calls. Testing
moves progressively from basic call through tests and on to CLASS,
LIDB, Operator Assisted Calls, etc. February 27 is the target date
for completion of the Houston testing. AT&T, American Telco, GTE,
Lufkin-Conroe, MCI, Southwest Bell, Time Warner Communications, WinStar
and WorldCom are all taking part in this inter-company network test
of LNP in the Houston area.

South West Bell experienced a problem with their LIDB and had been
working the problem all week. As of Thursday afternoon they received
information from their vendor that their problem would require a point
release to the STP/db software. The problem as explained by South
West Bell in a separate memo is as follows:

SWB initially selected the ISCP with Bellcore software for our LNP
database, but after looking at all the options, DSC provided an
option for an LNP database that used existing STPs without complicating
the network with additional network elements. In addition, SWB found
out that with our SS7 network design, using ISCPs, we would have instances
where LIDB queries would extend beyond the 2 second time limit causing
time-outs for some calls. The DSC solution also solved this problem.
The DSC STP integrated STP solution for LNP simply adds a few more existing
circuit packs into existing shelves to provide the LNP database function.
Once the software is loaded and the new packs are installed, each GTT
table for every service that contains ported NPA NXXs is marked as a large
model. When an LNP, CLASS, LIDB, or ISVM query is received by the STP,
it is sent to the Distributed SS7 Services (DSS) section, which is the
LNP database located in the STP, to look for a ten digit ported number
(the numbers flow to the STP from the LSMS via NetPilot). If the number
is found, the query is routed based on the ported number information.
If the number is not found, the query is sent back to the original GTT
and routed to the normal route in the table. Because the STP now serves as
an LNP database, DSC developed software that allows the STP to have
more than one alias point code. This is necessary to avoid transfer

prohibits to normal ISUP routing in the event of LNP database overload.

SWB received the new STP software, in January, early enough to run tests in the lab and in an FVO site. However, the SSPs had to convert to the new alias for CLASS, LIDB, and ISVM, before the GTTs could be changed to the large model. SWB had an aggressive schedule to do this but was unable to complete the conversion and turn on the LIDB GTT until the last week of January because of the TOPs machines schedule to change to the new alias point codes. When we did turn on the LIDB GTT as a large model for LNP, AIN services that use the LIDB database failed and caused customer trouble reports. In addition, SWB later found out that during time we also had around 2000 credit card pin errors. It took quite some time to isolate the problem to the STP software, but DSC finally isolated it to the DSS software. They began to determine if the code could be patched or would require a new release of software because of more complex changes. It wasn't until Thursday that SWB found out that it would require a new release of software.

The industry has completed several studies to determine the root cause of SS7 caused outages in the past few years. New STP software is one of the areas that has been suggested as being one of the most critical for proper regression testing. SWB will be thoroughly testing the new software release in the lab prior to installing it into our working network. DSC will be working with SWB to ensure that no time is lost. Because of our network layout, both regional STP pairs and the Houston STPs will require the new software prior to our Inter-company LIDB tests being completed.

SWB will ask for a waiver of March 31 given the schedule of software SWB is receiving from DSC for our STPs.

Service Provider's Summary of Testing Results for the Week of Feb 2 thru Feb 6.

American Telco's - ATI experienced porting challenges 2/9 which were resolved 2/10 after working with SWB SS7 group. We had an internal routing problem which we fixed and then started test calls.

Basic test calls, local, inter-lata and intra-lata, ported number-to-ported number, nonported-to-ported, and ported-to-nonported completed successfully.

Operator test calls failed until SWB updated the tables in the TOPS switch to include ported-in NPA-NXX's for American Telco.

Caller ID tests calls ok with SWB but not LC.

Caller name tests fail (ATI uses SWB's LIDB).

911 tests ok.

AT&T's - AT&T has completed the following test cases (successfully)

    4.5.1.1.10
    4.5.1.1.13
    4.5.1.1.28
    4.7.3
    4.5.7.1.1
    4.5.7.1.4

Most of these test cases were run multiple times to the various
providers.

GTE's - 4.1.1.1	4.2.5	4.5.1.1.29
4.1.1.2	4.2.5.1	4.5.1.1.31
4.1.1.3	4.3	4.5.1.7.1
4.2.1	4.3.1	4.5.1.7.2
4.2.1.1	4.3.2	4.5.1.7.3
4.2.1.1.2	4.3.3	4.5.3.1.1
4.2.1.1.3	4.3.3.1.1	4.5.3.2.1
4.2.1.1.4	4.3.3.1.2	4.5.3.3.1
4.2.1.1.5	4.3.3.1.3	4.5.3.4.1
4.2.1.1.6	4.3.4	4.5.3.7.1
4.2.3	4.4.1	4.5.7.1.7
4.2.3.1	4.4.1.1.2	4.7.1
4.2.3.2.2	4.4.1.1.4	4.8.1.1.1
4.2.4	4.4.2.1.1	4.8.1.1.2
4.2.4.1	4.4.3.1.1	4.8.1.2.1
4.2.4.1.1	4.4.4.1.1	4.8.1.2.2
4.2.4.1.1.1	4.5.1.1.1	4.8.2.1.1
4.2.4.1.1.2	4.5.1.1.2	4.8.2.1.3
4.2.4.1.1.3	4.5.1.1.4	4.8.2.1.4
4.2.4.1.1.4	4.5.1.1.10	4.8.2.1.5
4.2.4.1.1.5	4.5.1.1.13	4.8.2.1.6
4.2.4.2	4.5.1.1.18	4.8.3.1.1
4.2.4.3	4.5.1.1.19	4.8.3.1.2
4.2.4.3.1	4.5.1.1.21	4.8.3.1.3
4.2.4.2.1	4.5.1.1.26	4.8.3.1.4
4.2.4.2.2	4.5.1.1.27	4.8.4.1.1
4.2.4.2.3	4.5.1.1.28	4.8.4.2.1
		4.8.5.1.1
		4.8.5.2.1

Troubles that were resolved during testing:

    4.3.2 Provisioning Process order flow and code opening. Code
        409-856 was not opened by Illuminet. GTE provided incorrect
        DPC for LIDB.

    4.4.1.1.4 Porting with unconditional 10 Digit trigger
            code was not open at the time.
    4.5.1.1.4 Intra-Lata (SS7) Nonported number in an NPA-NXX
            open to portability to ported number. This was
            resolved with a temporary fix and referred to the
            manufacturer for perminate resolution in Willis.
    4.5.3.7.1 Caller Name Delivery Ported Number to Ported Number.
            The ported in name was not added to the GTE database.

Lufkin Conroe's - Lufkin-Conroe's Summary of Testing Results for
the Week of Feb 9 thru Feb 13. Illuminent has opened our 409-539
code in their LSMS database and as a result LCTX was able to move
forward with the planned call through testing with GTE. Also later
in the week LCTX did some call through testing with Worldcom,
American Telco, and Time Warner Communications. These tests also
seemed to work correctly. One problem that we were able to work
out was when LCTX performed a query to Illuminent's database on a
number that had been ported into our switch the query will perform
a dip and bring back LCTX's LRN and ring the phone even thought the
number was considered resident on our switch. Also, tests were performed
that verified that our switch would handle default routes and
database dips in order to complete the call to the appropriate
switch. In relation to the passing of LSR's between GTE and LCTX,
we worked with GTE on conflict resolution and discussed LSR corrections
but we have still not received corrected LSR's back from GTE relating
to the first ported number.

MCI's - Events MCI completed during the week of 2/9:

    4.3.4   Conflict Resolution w/SWB
    4.5.1.1.10 Basic Intra-Lata SS7 P-P
    4.5.1.1.13 Basic Intra-Lata SS7 NP-P
    4.8.1.1.1 0+ Intra-Lata P-P
    4.8.1.1.2 0+ Intra-Lata NP-P
    4.8.2.1.1 0+ 3rd #
    4.8.4.1.1 0+ collect
    4.5.6.2.2 E911

SWB's - Second week in a row that no summary was received.

TWC's - Time Warner has completed the following:

    Local and IXC calls to all ported numbers (except 713-475-0006
    WinStar.)

    Local and IXC calls from our SWBT and MCI donated numbers

    Collect and 3rd number billed call from AT&T to the MCI port in and
    SWBT port in numbers. Calls to the SWBT number failed.

This week we are continuing our Operator calls and collect and 3rd
number billed calls from the other participants. We will also be
scheduling CLASS testing with SWBT.

WorldCom's - No summary received.

WinStar's - Second week in a row that no summary was received.

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